

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

08 JUN -6 AM 9:52

UNITED STATES OF AMERICA
vs.
Alonzo SUAREZ-Arce

Magistrate's Case No.

08 MJ 1773

COMPLAINT FOR VIOLATION OF
21 U.S.C. 952 and 960

DEPUTY

Unlawful Importation of a Controlled Substance

The undersigned complainant being duly sworn states:

COUNT ONE

That on or about June 5, 2008, within the Southern District of California, defendant Alonzo SUAREZ-Arce did knowingly and intentionally import approximately 6.40 kilograms (14.11 pounds) of methamphetamine, a Schedule II Controlled Substance, into the United States from a place outside thereof; in violation of Title 21, United States Code, Sections 952 and 960.

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

Signature of Complainant
U.S. Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence, this Sixth day of June, 2008.

United States Magistrate Judge

C-1-2

1 United States of America
2 VS.
3 Alonzo SUAREZ-Arce

4 PROBABLE CAUSE STATEMENT

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6 On June 5, 2008 at approximately 0925 hours, Alonzo SUAREZ-Arce entered the United
7 States from Mexico at the San Ysidro Port of Entry (SYPOE), San Diego, California as the
8 driver and sole occupant of a Nissan Pathfinder bearing California license plate 4PEX564.
9 During pre-primary inspections, a Customs and Border Protection Officer (CBPO) made contact
10 with SUAREZ. SUAREZ identified himself to the CBPO via a California driver's license and a valid
11 State of California birth certificate. SUAREZ also provided the CBPO with a negative custom
12 declaration. SUAREZ stated that he lives in Tijuana, Mexico and was on his way to the DMV in Otay
13 Mesa, California in order to obtain the license plate tags for the Nissan Pathfinder he was driving. The
14 CBPO asked SUAREZ if he was the registered owner of the vehicle. SUAREZ stated that he purchased
15 the vehicle about 6 weeks ago and presented the CBPO with a valid vehicle registration that displayed
16 SUAREZ as the registered owner as of June 3, 2008. The CBPO stated that SUAREZ became very
17 nervous (trembling hands) after handing him the vehicle registration. The CBPO conducted a cursory
18 inspection of the vehicle and noticed that the gas tank tapped solid and that metal skid plate along with
19 the tank straps had been tampered with.
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21 The CBPO called a Canine Enforcement Officer (CEO) for assistance. The CEO responded
22 to the CBPO's request and screened the vehicle with her assigned narcotic and human detector
23 dog (NHDD). The NHDD alerted and responded to a narcotic odor emitting from the gas tank
24 region of a gray Nissan Pathfinder bearing California license plate 4PEX564. The CBPO
25 escorted the gray Nissan Pathfinder and SUAREZ to the vehicle secondary inspection lot for
26 further inspection.
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1 While in vehicle secondary, an intensive inspection of the vehicle was conducted
2 revealing a compartment within the gas tank. A total of 10 packages containing approximately
3 6.40 kilograms of methamphetamine were found concealed within the gas tank of the vehicle. A
4 presumptive test of one of the packages revealed a positive reaction to the presence of
5 methamphetamine.

6 SUAREZ was advised of his Miranda rights and stated that he was going to be paid an
7 unknown amount for the successful delivery of the narcotics into the United States. SUAREZ
8 added that he was to receive a phone call from a third party with directions on where to go as
9 soon as he successfully crossed the San Ysidro, California Port of Entry.
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11 SUAREZ was arrested and charged with violation of Title 21 USC 952, 960, Unlawful
12 Importation of a Controlled Substance, and was booked into the Metropolitan Correction Center,
13 San Diego, CA.
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